

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

YONEL BURNETT

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Magistrate No. 25-403
[UNDER SEAL]

AFFIDAVIT BY TELEPHONIC OR OTHER RELIABLE ELECTRONIC MEANS
IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Kristen P. Alesi, of the Federal Bureau of Investigation (“FBI”), being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. This Affidavit is made for the limited purpose of establishing probable cause in support of a criminal complaint and arrest warrant that from in or around July 2017, and continuing through July 2023, in the Western District of Pennsylvania and elsewhere, YONEL BURNETT (“BURNETT”) did knowingly, intentionally, and unlawfully conspire with persons both known and unknown, to commit Mail Fraud, in violation of 18 U.S.C. § 1341, and Wire Fraud, in violation of 18 U.S.C. § 1343, all in violation of 18 U.S.C. § 1349.

2. I am an “Investigative or Law Enforcement Officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

3. I entered on duty as a Special Agent of the FBI in 2021. I have received training and gained experience in interviewing and interrogation techniques, the execution of federal search and seizure warrants, and the identification and collection of financial and computer-related

evidence. I am currently assigned to the Complex Financial Crimes and Health Care Fraud squad in the FBI's Pittsburgh Field Office.

4. The information contained in this affidavit is based upon my personal knowledge; knowledge obtained during my participation in this investigation; knowledge obtained from other individuals, including my conversations with other law enforcement officers; knowledge obtained from my review of documents, computer records, and other evidence related to this investigation; and knowledge gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. I have not, however, excluded any information known to me that would defeat a determination of probable cause.

PROBABLE CAUSE

5. The FBI has probable cause to believe that BURNETT is a member of an organized crime group that targets elderly and otherwise vulnerable victims in the United States through a lottery scam. As further detailed below, the FBI has probable cause to believe BURNETT controlled email accounts yonelburnett20@gmail.com and yonelburnett20@icloud.com and telephone number (876) 821-8346. Evidence obtained related to each of these facilities show that they were used in furtherance of the lottery scam.

6. The Pittsburgh Field Office of the FBI, United States Postal Inspection Service, and Homeland Security Investigations are investigating the actors responsible for defrauding an 87-year-old victim in the Western District of Pennsylvania ("L.D.") out of hundreds of thousands of dollars by means of a lottery scam. The FBI has identified numerous other victims of the same scheme, resulting in substantial losses. The scheme is likely run by an OCG based in Jamaica, with co-conspirators located in both Jamaica and the United States.

7. A lottery scam is a type of fraud that most often begins with a telephone call or email to the victim. The perpetrators inform the victim that they have won a large sum of money in a lottery. The victim is then told to pay some sort of fee or charge in order to have the lottery proceeds released to them. In reality, there are no lottery proceeds, and the perpetrators deceive the victim for as long as possible in order to keep receiving fraudulent payments. To maintain the fraud, the perpetrators often change the rationale for not releasing funds over time, as well as introduce additional conspirators to the scheme who appear as new points of contact for the victim.

8. The victims of the lottery scheme are convinced to send money to members of the OCG through various methods. The investigation has revealed that members of the OCG have directed victims to send cash, money orders, checks, and wire transfers to co-conspirators or victims that became money mules. Some victims were directed to send cash, money orders, or checks through commercial shipping companies. Some victims were instructed to purchase gift cards and provide the account numbers to members of the OCG over the phone. Some victims were directed to deposit money directly into accounts held by other individuals.

9. On July 19, 2021, L.D. submitted a complaint via the FBI's Internet Crime Complaint Center ("IC3"), in which she explained that she had been contacted in April 2021 by an individual who claimed that L.D. won a lottery and needed to pay taxes on the prize in order to receive her winnings. L.D. sent money, purchased gift cards, and sent the gift card account numbers, as requested by the perpetrators. At the time of the complaint, L.D. reported she had lost \$102,900 pursuant to the scheme.

10. In December 2022, L.D.'s accountant contacted the FBI to report that L.D. had continued to be defrauded as part of the same scheme and that, as of October 2022, L.D.'s total losses were approximately \$400,000. The FBI obtained relevant financial documents from L.D.'s

accountant. The FBI interviewed L.D. in January 2023 and obtained relevant financial documents from L.D.

11. In a January 2023 interview with the FBI, L.D. stated that she was contacted by an individual who used the name Sheron Brooks around March 2022. L.D. believed that this person was someone different from the individual who had defrauded her in 2021. Brooks told L.D. that she had won a jackpot, but that she needed to send the IRS money in order to obtain her winnings. L.D. then began to send money at Brooks' direction. Over the course of the next several months, L.D. liquidated over \$100,000 that she had in the stock market, transferred those funds to her Citizens bank account, and wrote checks from that account to third-parties as directed by Brooks.

12. Brooks called L.D. on both her cell phone and her landline in furtherance of the scheme. L.D. provided a list of phone numbers that Brooks called from, which included the number 747-233-9509.

13. L.D. provided the FBI with handwritten notes and UPS receipts that contained some of the names and addresses where Brooks had directed L.D. to send checks. One of the names provided by L.D. was S.T., a 75-year-old man who resided in Harrisburg, Pennsylvania.

14. In February 2023 FBI Agents interviewed S.T., who explained that he became involved with the scheme when an individual, who used the name Chopper, contacted him via telephone around March 2020. Chopper told S.T. that he had won a \$15,000,000 prize through Publishers Clearing House. In order to collect the prize, S.T. was directed to send money to Chopper in the form of prepaid cards.

15. S.T. never received funds from Publishers Clearing House. Instead, Chopper continually provided explanations as to why the funds could not be released until S.T. sent Chopper more money. Eventually, other people were introduced over the phone to S.T. regarding the same scheme. These individuals used the names Pickenstine, Williams and Scott. The aforementioned

individuals requested money from S.T. so that he could receive his prize and directed S.T. to send and receive funds from third parties. S.T. sent money in the form of wires, bank transfers and prepaid cards. S.T. last sent funds to the OCG around June 2022 and was last contacted by the OCG around November 2022. S.T. estimated that he lost over \$170,000 pursuant to the fraud.

16. Based on review of S.T.'s Wells Fargo bank records obtained pursuant to legal process, S.T. last sent money around November 2022.

17. S.T. saved much of the documentation pertaining to the fraud and voluntarily turned those materials over to the FBI. S.T. provided the FBI with a spreadsheet that contained an itemized list of funds he had sent to the OCG, as well as funds that he received from third parties and forwarded at the direction of the OCG. An entry in the spreadsheet contained L.D.'s name, the amount \$30,000 and the date April 14, 2022.

18. Included in the documents provided by S.T. was a UPS envelope sent from L.D. on April 14, 2022 and a copy of Citizens Bank check 517107852-9, dated April 14, 2022, for \$30,000.

19. The documents provided by S.T. included other envelopes mailed from L.D., as well as a copy of a check from L.D. made payable to S.T., dated March 8, 2022, for \$4,000.

20. S.T. also provided the FBI with phone numbers and emails that the OCG used to contact him. One of the phone numbers provided by S.T. was 747-233-9509. This was the same phone number that the OCG used to contact L.D.

21. The fact that two different victims were contacted from the same phone number, and that one victim sent funds to another, provides probable cause to believe that the same OCG defrauded both L.D. and S.T.

22. S.T. provided the FBI with emails sent from the OCG. One of the emails was sent to S.T. on April 5, 2022 from tpickenstine@gmail.com. The email instructed S.T. to send \$1,740 to the Wells Fargo bank account of a third party.

23. The FBI queried its systems for additional related victims and located a complaint filed with IC3 on November 4, 2022. The Complaint, filed by A.K., a resident of Illinois, alleged that A.K. was defrauded of \$20,000 in a lottery scam. The Complaint alleged that A.K. had received emails in furtherance of the scheme from tpickenstine@gmail.com.

24. The FBI contacted A.K. in February 2023. A.K. provided the FBI with emails sent in furtherance of the scheme, including an email sent from tpickenstine@gmail.com in October 2022 that attached a document stating that A.K. needed to pay \$145,000 to claim his prize.

25. On March 1, 2023, the Honorable Lisa Pupo Lenihan signed a search warrant (No. 23-343) for two email accounts, one of which was tpickenstine@gmail.com, for the time frame January 1, 2021 to present. A review of records produced by Google pursuant to the search warrant included several emails from jmary5055@gmail.com to tpickenstine@gmail.com that list a name in the subject line and include photographs of pages from a notebook which contain handwritten notes with personally identifiable information (PII) and financial account information.

26. On November 8, 2021, jmary5055@gmail.com sent an email to tpickenstine@gmail.com with the subject "Money" and five attachments. Each attachment contained a photograph of a page from a notebook with handwritten notes containing PII and bank account information. One of these attachments included notes with L.D.'s name, address, date of birth, social security number, and father's name. On November 13, 2021, jmary5055@gmail.com sent an email to tpickenstine@gmail.com with L.D.'s name as the subject. There were three attachments to the email that showed photographs from pages in a notebook that contained L.D.'s PII, financial account numbers and card verification code (CVC) codes.

27. Information located in the tpickenstine@gmail.com, along with other information obtained through the investigation, indicated that tpickenstine@gmail.com was controlled by suspected co-conspirator Jason Plummer. As a result of information provided in the

tpickenstine@gmail.com account and other evidence obtained in the investigation, Jason Plummer was indicted by a federal grand jury in the Western District of Pennsylvania for violating 18 U.S.C. § 1349 and 18 U.S.C. § 1956(h).

28. The tpickenstine@gmail.com account contained an email from tpickenstine@gmail.com to a third party on or around July 17, 2021. The email included the text, “Good morning, Mr. [A.R.]¹ I just spoke with my C.E.O and he is willing to spend you your thirty five million dollars (\$35,000,000) in full by wire transfer, once you complete your wire transfer of three thousand dollars (\$3,000) in full to.” The email then provided name B.B., an address in Florida and account and routing numbers and ended with, “Thanks much for your cooperation”, “Sign: T.Pickenstine”.

29. B.B. and his wife, S.B., were interviewed by the FBI in or around August 2023. During the interview, they stated that had lost approximately \$400,000², including their home, possessions, and vehicle through scams where the couple paid taxes in advance of collecting jackpots from contests like Publisher’s Clearing House, Reader’s Digest, and Mega Millions. They were expecting a jackpot of \$35 million, two cars, and a briefcase of cash and gold from Publisher’s Clearing House and an additional \$7.5 million and two cars from Mega Millions. B.B. stated they both had become addicted to scams. They had been previously interviewed by FBI and HSI agents in or around 2019 about their participation in scams and had been told by a friend that what they were doing constitutes money laundering.³

¹ The individual’s full name was redacted to maintain their privacy.

² In a later interview in or around October 2023, S.B. estimated their loss to be approximately \$110,035 in Publisher’s Clearinghouse and Mega Millions scams.

³ B.B. and his wife provided their former address, which matched the address provided in the above tpickenstine@gmail.com email.

30. Records provided by Truist for an account associated with Daniel Imani Reid-Williams included a July 14, 2021 statement which listed four deposited Zelle payments from B.B. ranging from \$400 to \$1,000 each.

31. Daneil Reid's phone was detained and imaged pursuant to a border search at Miami International Airport in April 2023. In August 2023, a search warrant was signed in the Western District of Pennsylvania by United States Magistrate Judge Maureen Kelly for the imaged copy of the phone.

32. A group message located on the phone included a message sent from Reid's device on January 20, 2023 with a photo of names, addresses, and phone numbers of individuals in the United States. Yonelburnett20@icloud.com replied, "Monday me a start dial".

33. Based on other evidence obtained through the course of the investigation, this photo is consistent with "leads" or lists of names and contact information for potential victims that members of the conspiracy intended to target with the lottery scam.

34. There were also iMessages between one of the phone numbers associated with Reid's device and +18768218346. On or around April 12, 2023, Reid's device sent +18768218346 a message with "+1 (876) 571-4446".

35. Records provided by Google in June 2023 listed the recovery SMS for account tpickenstine@gmail.com as +18765714446 and the recovery email address as skeng56@gmail.com.

36. Records provided by Google in February 2023 listed the recovery SMS for account skeng56@gmail.com as +18765714446 and the recovery email address as plummerjason41@gmail.com.

37. Records provided by Apple in July 2023 showed that plummerjason41@gmail.com was used as an Apple ID for DSID 16424607775, associated with name Jason Plummer. The verified phone number associated with this account was 18765714446.

38. Based on the Google and Apple records, as well as other information obtained through the investigation, +1 (876) 571-4446 was a phone number associated with Jason Plummer.

39. Based on information from the imaged copy of Reid's phone and other evidence obtained through the investigation, in October 2023, Daneil Reid was indicted by a federal grand jury in the Western District of Pennsylvania for violating 18 U.S.C. § 1349 and 18 U.S.C. § 1956(h).

40. In or around November 2024, Apple provided information for an account associated with yonelburnett20@icloud.com. Included in information related to the account was billing name YONEL BURNETT and address 39 N Burnett St., Apt. 3, East Orange, NJ 07017-3558.

41. Records provided by JP Morgan Chase Bank in or around May 2024 for an account held by YONEL BURNETT included 39 N Burnett St., Apt. 3, East Orange, NJ 07017-3558 as a personal address for BURNETT, date of birth 02/20/1997, and a passport as primary ID with ID number A3815264 with issuer "JMA".

42. In or around 2022, YONEL BURNETT with date of birth February 20, 1997, and Jamaican passport number A3815264, applied for a visa to enter the United States. This application included telephone number 8768218346 and email yonelburnett20@gmail.com.

43. The telephone number listed in the visa application is the same number that Reid's device sent Jason Plummer's phone number to.

44. Records provided by Early Warning Services showed at least one payment from Reid to YONEL BURNETT, with recipient token yonelburnett20@gmail.com, in March 2023.

45. In May 2024, United States Magistrate Judge Patricia Dodge signed a 2703(d) Order for Google accounts including the account, yonelburnett20@gmail.com.

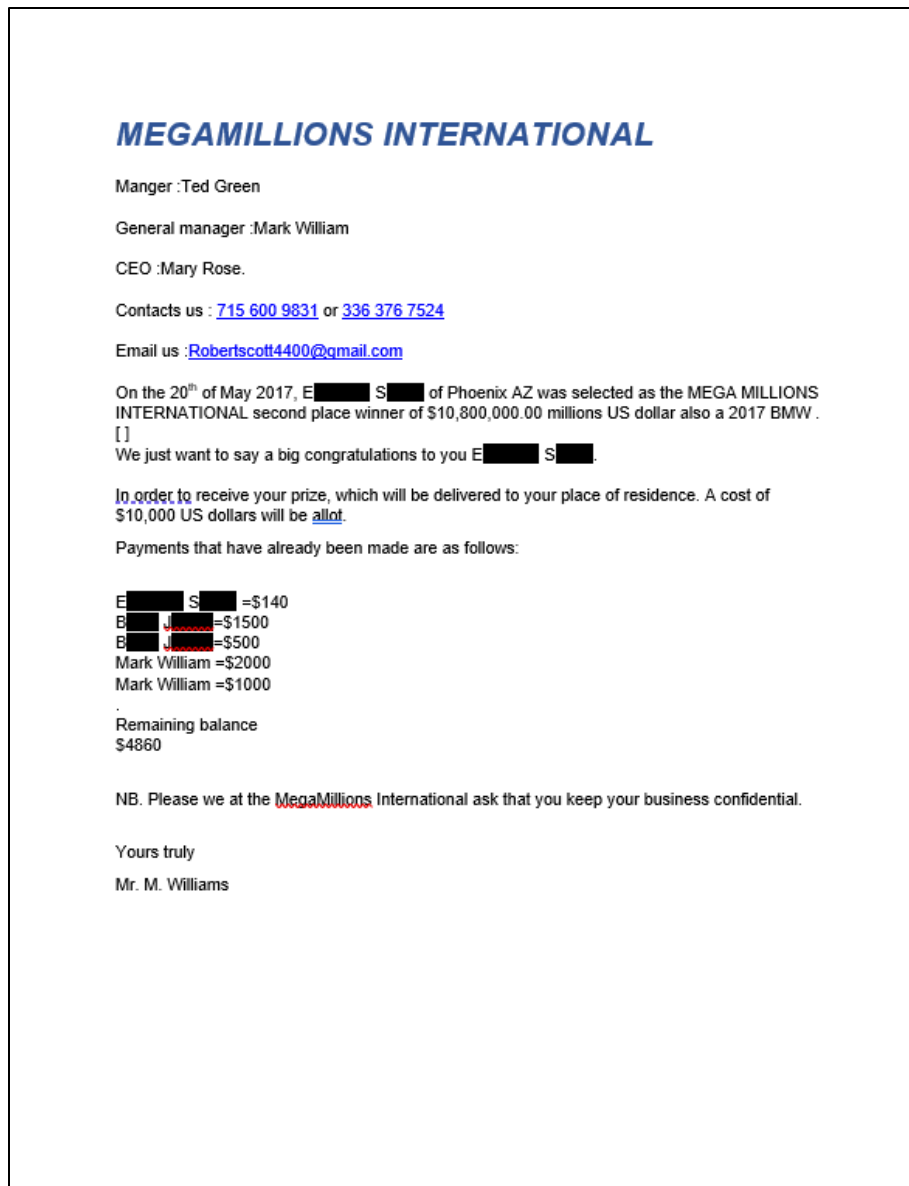
46. The records for yonelburnett20@gmail.com included email messaging logs which showed two emails sent from Daneilimani@icloud.com to yonelburnett20@gmail.com, one in May 2020 and one in February 2023.

47. In July 2023, Apple provided records for the iCloud account associated with daneilimani@icloud.com. These records indicated that Daneil Reid was the name associated with the account.

48. In October 2024, the Honorable Christopher Brown signed a search warrant in the Western District of Pennsylvania for three email accounts, one of which was yonelburnett20@gmail.com.

49. During review of the search warrant production for yonelburnett20@gmail.com, there were emails identified which appeared to be in furtherance of the scheme. One such email was from yonelburnett20@gmail.com to a third party sent in or around July 7, 2017. The email included an attached document titled “document winnet.docx”; a screenshot of the document follows⁴:

⁴ The names of third parties listed in the document were redacted except for initials to protect privacy.



50. Another email identified during the review was a forwarded email chain from yonelburnett20@gmail.com that appears to have originated in or around April 2023. In or around July 2023, yonelburnett20@gmail.com forwarded this email to a third party, with an attached spreadsheet which included hundreds of names, emails, addresses, phone numbers, and IP addresses. This document was also consistent with the “leads” documents described above.

51. The account’s search history included searches for “can a use a card that is registered to someone else on cashapp?”, “cash overseas check in jamaica”, “check cashed from

a third party bank in regions account”, “how long does regions bank take to verify a personal check”, and “how long after a check deposit will it bounce”.

52. The yonelburnett20@gmail.com also contained emails which appear to be with a Regions Bank VP, Branch Manager located in Fort Lauderdale, Florida. On or around May 25, 2023, yonelburnett20@gmail.com emailed the Regions email account stating, “Goodmorning, there is Hold against my Account , I am assuming it’s because of a deposit I received for \$1300 on the 23rd of this month. The deposit is titled “Forced Deposit “ however I am being told to come in the branch how I am not in the country and I would like some insight on what is taking place.”

53. Records provided by Regions Bank related to an account for YONEL BURNETT included a \$1,300 cashier’s check from TVFCU paid to the order of Yonel Burnett, Re: D. M. This check had a posting date of May 23, 2023.⁵ This account also had a \$3,900 check which appeared to be from D.M., with an address in Tennessee. This check had a posting date of April 12, 2023.

54. In or around January 2025, the FBI interviewed D.F., whose father, D.M, had been contacted three or four years earlier and told he had won a large sum of money. In order to receive the money, D.M. was required to pay taxes for the winnings. Over the two years that followed, D.M. sent cash, money orders, and gift cards at the scammers’ direction. D.F. estimated that D.M. had lost approximately \$240,000. D.M. has dementia, so he no longer has a phone or bank accounts.

55. D.F. had previously contacted the FBI in June 2023 to report D.M. as a victim of a scam. The address provided for D.M. matched the address listed on the \$3,900 check deposited into Burnett’s Regions Bank account.

⁵ The corresponding account statement listed a “Forced Deposit” on May 24, 2023 of \$1,300.

56. Records provided by TextNow in or around October 2024 included four TextNow phone numbers associated with subscriber YONEL BURNETT, username yonelburnett20, and email yonelburnett20@gmail.com. One of the phone numbers associated with the account was +15512423854 with phone ownership dates between November 1, 2021 17:45:07 UTC and February 16, 2022 06:30:42 UTC. Call detail records provided by Text Now included approximately five calls from +15512423854 to a phone number ending in x2320 (hereinafter “Telephone Number 1”)⁶ between approximately November 1, 2021 and January 12, 2022, and at least one call to a phone number ending in x3949 (hereinafter “Telephone Number 2”) on or around January 12, 2022.

57. In or around February 2025, the FBI interviewed R.Z., who stated his home telephone number was Telephone Number 1. His previous cell phone number was Telephone Number 2. R.Z. was a victim of several scams between 2017 and 2023. During this time, he had multiple conversations with individuals who told him he won money. This started when an individual who said his name was Bob told R.Z. he won \$8.5 million from Publisher’s Clearing House. He was later told he won \$23 million from Reader’s Digest. The amount of winnings increased over time. He was told that in order to receive his prize money, he needed to pay taxes and fees. R.Z. estimated he lost his life savings of approximately \$50,000. Around 2021, he had lost all his money and was in the process of losing his home. Around this time, his family intervened and helped him realize he was being scammed. He stopped sending money to the individuals, but he continued to receive scam calls.

⁶ One of these calls had a 0 duration.

CONCLUSION

58. In conclusion, there is probable cause to believe BURNETT conspired with Jason Plummer and Daneil Reid as a part of the same lottery scam scheme in which they were indicted.

59. Based upon my training, knowledge, experience, and the foregoing facts, I believe probable cause exists that, from in or around July 2017 and continuing through July 2023, in the Western District of Pennsylvania and elsewhere, BURNETT conspired to commit mail and wire fraud, in violation of Title 18, United States Code, Section 1349.

The above information is true and correct to the best of my knowledge, information and belief.

Respectfully submitted,

s/Kristen P. Alesi

Kristen P. Alesi, Special Agent
Federal Bureau of Investigation

Sworn and subscribed before me, by telephone
pursuant to Fed. R. Crim. P. 4.1(b)(2)(A),
this 13th day of March 2025.

HONORABLE CHRISTOPHER BROWN
UNITED STATES MAGISTRATE JUDGE